

JOHN J. FARMER, JR.  
ATTORNEY GENERAL OF NEW JERSEY  
- Attorney for Plaintiffs

FILED

OCT 14 1999

By: Lynn Denis  
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124 Halsey Street  
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Newark, New Jersey 07102  
Telephone (973) 648-2975

MAURICE J. GALLIPOLI, J.S.C.

SUPERIOR COURT OF NEW JERSEY  
CHANCERY DIVISION-HUDSON COUNTY  
DOCKET NO. C-115-99

JOHN J. FARMER, JR., Attorney  
General of the State of New  
Jersey; MARK HERR, Director of  
the Division of Consumer Affairs;  
and the NEW JERSEY STATE BOARD  
OF DENTISTRY

Plaintiffs,

vs.

GUILLERMO CORDERO a/k/a  
SENOR GUILLERMO

Defendant

Civil Action

CONSENT ORDER AND JUDGMENT  
IMPOSING PERMANENT INJUNCTION  
CIVIL PENALTIES, COSTS  
AND COUNSEL FEES

CERTIFIED TRUE COPY

This matter was opened to the Court by an ex parte application heard by The Honorable Arthur N. D'Italia, A.J.S.C. on August 13, 1999 and brought by John J. Farmer, Jr., Attorney General of New Jersey, counsel for plaintiffs, Deputy Attorney General Lynn Denis appearing, pursuant to N.J.S.A. 45:1-23, 45:6-1 et seq., 56:8-8 and 56:8-13. A proposed settlement agreement was submitted orally to

the Court on September 9, 1999, Acosta & Russotti, L.L.P., Robert Russotti, Esq. appearing for the defendant. Guillermo Cordero was also present, and a Spanish language interpreter was provided by the Court. Defendant Guillermo Cordero admits that his conduct constitutes a violation of N.J.S.A. 56:8-2, N.J.S.A. 45:6-13 and N.J.S.A. 45:1-23, in that he engaged in the unlicensed practice of dentistry as set forth in Counts I and II and the employment of false pretense and misrepresentation as set forth in Count III of the Verified Complaint. Defendant Cordero represents that he is not now engaged in the practice of dentistry in the State of New Jersey and that he is not now in possession of any equipment or medication (other than medication that may be prescribed for his own personal use) used in the performance of the practice of dentistry. Defendant Guillermo Cordero represents that he understands the terms and conditions of this Consent Order and Judgment; that the within Order and Judgment in its entirety has been translated into Spanish for him pursuant to the Court's directive on September 9, 1999; and that he has agreed to the entry of said Order and Judgment settling this matter. It further appears that the entry of a permanent injunction and the imposition of civil penalties, counsel fees and costs against the defendant Guillermo Cordero are warranted, and for good cause shown,

IT IS on this 14<sup>th</sup> day of October 1999, ORDERED:

1. Defendant Guillermo Cordero shall be and hereby is permanently enjoined from offering or performing any services or engaging in any practice requiring licensure in the State of New Jersey as a dentist or dental hygienist or requiring registration in the State of New Jersey as a dental assistant unless and until duly licensed or registered to do so.

2. Defendant Guillermo Cordero shall be and hereby is permanently enjoined from employment of false pretense and misrepresentation by engaging or offering to engage in any activity within the practice of dentistry in the State of New Jersey unless and until licensed or registered therefor.

3. Defendant shall be and hereby is permanently enjoined from possession of any equipment or medication (other than medication that may be prescribed by a duly authorized professional for the defendant's own personal use) used in the performance of the practice of dentistry unless and until he is duly licensed or registered with the Board of Dentistry.

4. Defendant Guillermo Cordero is hereby assessed \$5,755.62 for costs pursuant to N.J.S.A. 45:1-25.

5. Defendant Guillermo Cordero is hereby assessed civil penalties of \$5,000 pursuant to N.J.S.A. 45:1-25 and N.J.S.A. 56:8-13. Specifically, defendant is assessed a civil penalty of \$2,500 for the unlicensed practice of dentistry in violation of

N.J.S.A. 45:6-13; and a civil penalty of \$2,500 for the engagement in false pretense and misrepresentation in violation of N.J.S.A. 56:8-2.

6. Defendant Guillermo Cordero is hereby assessed attorney's fees in the sum of \$1,744.38 pursuant to N.J.S.A. 56:8-19.

7. Payment of all sums assessed herein shall be made within ten days of the entry of this Order. \$8,255.62 of the total sum shall be made payable to the New Jersey State Board of Dentistry. \$4,244.38 shall be made payable to the New Jersey Division of Consumer Affairs.

8. Notwithstanding the provision for payment in paragraph 7 herein, the defendant may pay the total sum of \$12,500 in installments, provided that defendant makes an initial payment to the Board of Dentistry in the sum of \$2,500 on or before September 24, 1999. In such event, the defendant shall make ten subsequent payments, each in the sum of \$1,000 plus interest at the rate of 5.5% as specified in Schedule A, which is hereby attached to this Order and incorporated herein by reference. Said subsequent payments shall be made pursuant to the following schedule: Beginning on or before November 1, 1999, and on or before the first day of each of the five succeeding months, defendant shall make payments to the Board of Dentistry in the

amount of \$1,022.92. On or before May 1, 2000, defendant shall pay the sum of \$1,022.92 in two separate payments: \$663.97 shall be made payable to the Board of Dentistry, and \$358.95 shall be made payable to the Division of Consumer Affairs. Thereafter, payments shall be made to the Division of Consumer Affairs. Two such payments, each in the sum of \$1,022.92 shall be due on or before June 1, 2000, and July 1, 2000, respectively. On or before August 1, 2000, the last payment, in the sum of \$1,022.89, shall be due. In the event the defendant fails to make any required payment on or before the date it is scheduled to be paid, the entire amount of all unpaid portions of the total sum (with interest) shall become immediately due.

9. All payments consented to and ordered herein shall be made by attorney trust account check, certified check or money order. Sums made payable to the New Jersey State Board of Dentistry shall be delivered to:

Agnes M. Clarke, Executive Director  
124 Halsey Street, 6th Floor  
Newark, New Jersey 07102.

Sums made payable to the Division of Consumer Affairs shall be delivered to:

New Jersey Department of Law and Public Safety  
Division of Consumer Affairs  
124 Halsey Street, P.O. Box 45025  
Newark, New Jersey 07101  
Att. Case Management Tracking Unit.

10. Installment payments made pursuant to paragraph 8 above shall first be applied to fulfillment of the costs and fees obligations, and thereafter to fulfillment of the civil penalties obligation.

11. Defendant Guillermo Cordero shall have the right to seek modification of the payment schedule outlined in paragraph 8 of this Order by:

(a) Submitting a written request the Board of Dentistry with a copy to the Division of Consumer Affairs at the addressed set forth in paragraph 9.

(b) The request shall set forth in writing any and all reasons why said payment schedule should be modified.

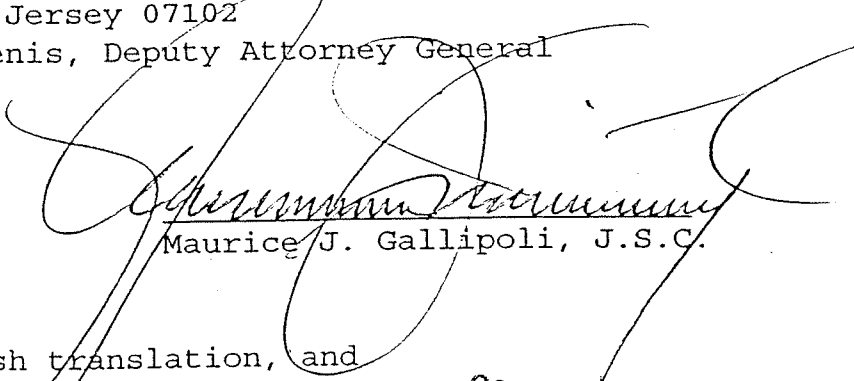
(c) The request shall be accompanied by any and all documents or other written evidence supporting the requested modification and reasons therefor.

(d) The Board and the Office of the Attorney General will review the request and accompanying documentation and will issue a written response granting or denying the request and the reasons therefor.

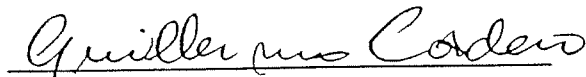
12. Defendant Guillermo Cordero shall provide plaintiffs immediate notification of any change of residential address until all obligations set forth in this Order have been successfully fulfilled. The current residential address of defendant

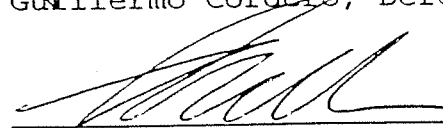
Guillermo Cordero is 77 Mission Street, Montclair, New Jersey  
- 07042. Notice pursuant to this paragraph shall be mailed to the  
following address:

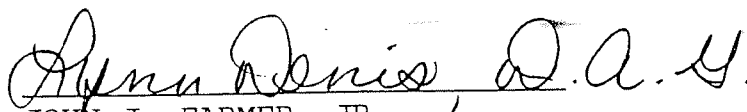
Attorney General John J. Farmer, Jr.  
New Jersey Department of Law & Public Safety  
Division of Law  
124 Halsey Street, 5th Floor  
Newark, New Jersey 07102  
Att. Lynn Denis, Deputy Attorney General

  
Maurice J. Gallipoli, J.S.C.

I have read, in Spanish translation, and  
I understand the terms and conditions of  
the within Order and I agree to be bound  
by them. I hereby agree to the form and  
give my consent to the entry of this Order.

  
Guillermo Cordero, Defendant

  
Jorge O. Acosta, Esq. Robert A. Russotti, Esq.  
Attorney for Defendant

  
JOHN J. FARMER, JR.,  
ATTORNEY GENERAL OF NEW JERSEY  
Attorney for Plaintiffs  
BY: Lynn Denis, DAG

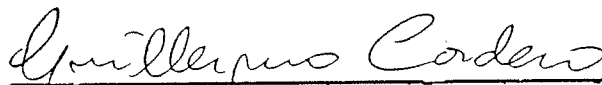
COPY OF THE ORDER TO  
BE SERVED UPON ALL PARTIES  
WITHIN 7 DAYS

Guillermo Cordero is 77 Mission Street, Montclair, New Jersey 07042. Notice pursuant to this paragraph shall be mailed to the following address:

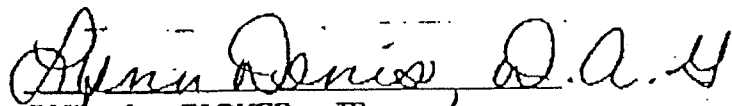
Attorney General John J. Farmer, Jr.  
New Jersey Department of Law & Public Safety  
Division of Law  
124 Halsey Street, 5th Floor  
Newark, New Jersey 07102  
Att. Lynn Denis, Deputy Attorney General

Maurice J. Gallipoli, J.S.C.

Yo he leído, la traducción española, y comprendo los términos y condiciones de la orden contenida en ella y accedo a atenerme a ellos. Mediante la presente yo acepto el formulario y doy mi consentimiento a que se haga efecto la orden.

  
Guillermo Cordero, el acusado.

Jorge O. Acosta, Esq.  
Attorney for Defendant

  
JOHN J. FARMER, JR.  
ATTORNEY GENERAL OF NEW JERSEY  
Attorney for Plaintiffs  
BY: Lynn Denis, DAG



SCHEDULE A  
To Consent Order and Judgment  
I/M/O Farmer, Jr. et als v. Guillermo Cordero  
C-115-99

LOAN AMORTIZATION

PRINCIPAL \$10,000.00  
INTEREST RATE 5.5% SIMPLE INTEREST  
TERM (BEG 11/1/99...END 8/01/00) 10 MONTHS

SUM OF ALL PAYMENTS (TEN) \$10,229.17

11/01/1999	\$1,022.92
12/01/1999	\$1,022.92
1/01/2000	\$1,022.92
2/01/2000	\$1,022.92
3/01/2000	\$1,022.92
4/01/2000	\$1,022.92
5/01/2000	\$1,022.92
6/01/2000	\$1,022.92
7/01/2000	\$1,022.92
8/01/2000	\$1,022.89

TOTAL \$10,229.17